

EXHIBIT G

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Case No. 1:16-cv-05439-JPO

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GLEN CRAIG,

Plaintiff,

vs.

UNIVERSAL MUSIC GROUP, INC.,

KINGSID VENTURES, LTD., and ESTATE

OF RILEY B. KING,

Defendants.

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DEPOSITION OF GLEN CRAIG

New York, New York

March 17, 2017

Reported by:

Linda Salzman, RPR

Job No. 18403

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March 17, 2017

3 10:30 a.m.

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2 A P P E A R A N C E S:

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4 On Behalf of Plaintiff:

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8 (516) 233-1660

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14 On Behalf of Defendants:

15 LOEB & LOEB LLP

16 345 Park Avenue

17 New York, New York 10154

18 (212) 407-4953

19 BY: LINNA CHEN, ESQ.

20 lchen@loeb.com

21

22 Also Present:

23 CARLA MILLER, ESQ.

24 Universal Music Group

25

1 G. Craig

2 Q. You said you quit working for
3 Mr. Bernstein?

4 A. Uh-huh.

5 Q. When was that?

6 A. '70, something.

7 Q. After you quit, did you continue
8 to have a relationship with Mr. Bernstein?

9 A. Oh, yeah. Until he died.

10 Q. Was it a business or personal
11 relationship?

12 A. Father/son relationship. He
13 knew my dad.

14 Q. So you two were very close?

15 A. Yes.

16 MS. CHEN: Let's mark this 3,

17 and then 3A, 3B, 3C.

18 (Craig Exhibit 3, Photograph,
19 marked for identification, as of this
20 date.)

21 (Craig Exhibit 3A, Photograph,
22 marked for identification, as of this
23 date.)

24 (Craig Exhibit 3B, Photograph,
25 marked for identification, as of this

1 G. Craig

2 date.)

3 (Craig Exhibit 3C, Photograph,
4 marked for identification, as of this
5 date.)

6 BY MS. CHEN:

7 Q. So I just gave you a document
8 marked Exhibit Craig 3, 3A through 3C. I
9 will represent to you this was Exhibit A
10 that was attached to the Complaint filed
11 in this action.

12 A. Yes.

13 Q. Did you take photographs, 3A
14 through 3C?

15 A. First one, 3A, the answer is
16 yes.

17 3B, yes.

18 And 3C, yes.

19 Q. Did you take them at the same
20 event?

21 A. That I beg to say. Maybe yes,
22 maybe no.

23 Q. You're not sure?

24 A. No.

25 Q. Why not?

1 G. Craig

2 A. Do you remember 45 years ago
3 what you were doing at what hour?

4 Q. I'm the one asking questions.

5 A. Well, I'm asking you that
6 question.

7 Q. I'm under no obligation to
8 answer.

9 A. Okay.

10 Q. If that's your answer that's
11 fine.

12 A. That's the answer. No.

13 Q. When did you take the first
14 photograph 3A?

15 A. During the period probably 1969
16 to 1970.

17 Q. When did you take 3B?

18 A. Same thing.

19 Q. 3C?

20 A. Same thing.

21 Q. What makes you say that these
22 three photographs were taken around that
23 time?

24 A. How?

25 Q. Yeah.

1 G. Craig

2 photographs do not appear, but the layout
3 in the middle was generously taken and put
4 into this book.

5 MS. CHEN: Off the record.

6 (Thereupon, a recess was taken,
7 and then the proceedings continued as
8 follows:)

9 By MS. CHEN:

10 Q. So you explained that 3B and 3C,
11 you saw those in the tour book?

12 A. Yes.

13 Q. Was 3A in the tour book as well?

14 A. Yes.

15 Q. So is this exhibit a scan that
16 you took from the tour book?

17 A. No.

18 Q. No.

19 A. This is my actual from the
20 prints. This one?

21 Q. Yes.

22 A. Yeah.

23 Q. So this is a copy of a print of
24 the photograph that you took?

25 A. Yes.

1 G. Craig

2 would have asked other people to see your
3 photographs of Mr. King?

4 A. I would suspect so.

5 Q. Why do you say that?

6 A. Well, based, it's only on theory
7 and deduction, that I put together, again,
8 maybe it's irrational thinking, but gee,
9 Ruby Mazur is at Changes Magazine during
10 that time period.

11 That book or books that we found
12 that were published were approximately in
13 1971 that book was published. How did
14 those pictures wind up from Changes
15 Magazine, which you just saw is the
16 layout, into that book? Explain that.

17 Q. Well, I'm focusing on the three
18 photographs at issue which are not in the
19 layout.

20 A. Yes.

21 Q. You said you only gave working
22 prints of those three pictures to Changes
23 Magazine, correct?

24 A. I told you we gave them
25 approximately 50, 60 pictures.

1 G. Craig

2 Q. So you gave a working print of

3 3A, 3B and 3C to Changes Magazine?

4 A. Yes.

5 Q. Is that the only time where you

6 gave any print or any copy of any print of

7 3A, 3B and 3C to anybody?

8 A. Correct.

9 Q. How many prints did you make of

10 3A at that time?

11 A. Because of the darkness to them,

12 probably a little bit lighter version so

13 you could see the shadows and so forth and

14 a darker version.

15 Q. So you have a lighter and a

16 darker version of 3A?

17 A. Yeah.

18 Q. And you still have those two in

19 your possession, those two prints?

20 A. No.

21 Q. Where did they go?

22 A. That's what we're asking. Where

23 do they go?

24 Q. For 3B, how many prints did you

25 make of that?

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2 ----- EXHIBITS -----
3 CRAIG FOR ID.
4 Exhibit 1 Document 16
5 Exhibit 2 Request for documents 45
6 Exhibit 3 Photograph 151
7 Exhibit 3A Photograph 151
8 Exhibit 3B Photograph 151
9 Exhibit 3C Photograph 152
10 Exhibit 4 E-mail, Bates stamped
11 UMG000259 through 266 195
12 Exhibit 5 B.B. King Live in Japan
13 CD 217
14 Exhibit 6 E-mail chain, Bates
15 stamped GC00019 through
16 GC00026 236
17 Exhibit 7 E-mail and attachments,
18 Bates stamped UMG0000118
19 through 121, UMG0000131 258
20 Exhibit 8 E-mail, Bates stamped
21 UMG0000885 265
22
23
24
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